

APR 04 2017

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

David J. Bradley, Clerk of Court

17CR0194

UNITED STATES OF AMERICA,

v.

USMAN AMINU AHMADU, a/k/a  
Ademola Ebenezer Ozolua,

Defendant.

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Criminal Action No.: H-4:17-cr-

**UNDER SEAL****INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT ONE****UNLAWFUL PROCUREMENT OF CITIZENSHIP OR NATURALIZATION –**  
**18 U.S.C. § 1425(a)**

On or about April 10, 2007, in the Houston Division of the Southern District of Texas,

**USMAN AMINU AHMADU, a/k/a ADEMOLA EBENEZER OZOLUA,**

the defendant, knowingly procured and attempted to procure, contrary to law, his naturalization, to wit: by knowingly and willfully making under oath and penalty of perjury, material false statements in connection with his application for naturalization, in violation of 18 U.S.C. § 1001, when, during an interview with an official of the United States Department of Homeland Security and on a Form N-400 Application for Naturalization, he falsely claimed that:

- (1) The only other name he has every used was Ademola Ebenezer Ozolua;
- (2) He had never committed a crime or offense for which he was not arrested;
- (3) He was never arrested, cited or detained by any law enforcement officer (including former INS and military officers) for any reasons;
- (4) He had never given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion or removal;

- (5) He had never lied to any U.S. government official to gain entry or admission into the United States;
- (6) He had never been ordered removed, excluded or deported from the United States; and
- (7) He had never applied for any kind of relief from removal, exclusion or deportation.

In violation of 18 U.S.C. § 1425(a).

**COUNT TWO**

**FALSE STATEMENTS UNDER OATH IN MATTER RELATING TO NATURALIZATION  
OR CITIZENSHIP -- 18 U.S.C. § 1015(a)**

On or about April 10, 2007, in the Houston Division of the Southern District of Texas,

**USMAN AMINU AHMADU, a/k/a ADEMOLA EBENEZER OZOLUA,**

the defendant, did knowingly make a false statement under oath, in a naturalization interview and application, which is a case, proceeding, and matter under sections 1421-1450 of Title 8 of the United States Code and Title 8 of the Code of Federal Regulations, a law of the United States relating to naturalization, citizenship, or registry of aliens, to wit: by falsely claiming that:

- (1) The only other name he has every used was Ademola Ebenezer Ozolua;
- (2) He had never committed a crime or offense for which he was not arrested;
- (3) He was never arrested, cited or detained by any law enforcement officer (including former INS and military officers) for any reasons);
- (4) He had never given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion or removal;
- (5) He had never lied to any U.S. government official to gain entry or admission into the United States;
- (6) He had never been ordered removed, excluded or deported from the United States; and
- (7) He had never applied for any kind of relief from removal, exclusion or deportation.

In violation of 18 U.S.C. § 1015(a).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

ABE MARTINEZ  
Acting United States Attorney, Southern District of Texas

  
Adam Laurence Goldman  
Assistant United States Attorney